

September 25, 2002

James R.J. Scheltema
Director, Regulatory Affairs
Global NAPs, Inc.
5042 Durham Road West
Columbia, MD 21044-1445

Keefe B. Clemons, Esq.
Verizon Massachusetts
185 Franklin Street - 13th Floor
Boston, MA 02110-1585

RE: D.T.E. 02-45 - Global NAPs, Inc./Verizon Arbitration
First Set of Information Requests

Dear Attorneys Scheltema and Clemons:

Enclosed please find the Department of Telecommunications and Energy's First Set of Information Requests regarding the above-referenced proceeding. Please respond to these Information Requests by close of business on October 2, 2002. If you have any questions regarding these requests, please contact me at (617) 305-3578.

Sincerely,

/s/

Tina W. Chin
Arbitrator

Encl.
cc: Mary Cottrell, Secretary
Service List

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS
D.T.E. 02-45**

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Global NAPs, Inc. and Verizon New England, Inc. the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the company finds that any one of these requests is ambiguous, please notify the Arbitrator so that the request may be clarified prior to the preparation of a written response.

7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the responses to Tina W. Chin, Arbitrator, and 3 (three) copies to the Telecommunications Division.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS TO GLOBAL NAPS, INC.
D.T.E. 02-45

- DTE-GN-1 Please refer to p. 23, para. 52 of the Global NAPs petition. Does this paragraph refer to Massachusetts policy, or New York Public Service Commission policy? If the paragraph refers to Massachusetts policy, specifically identify which Department decisions are being contradicted.
- DTE-GN-2 Is Global NAPs LNP-capable?
- DTE-GN-3 Is Global NAPs participating in thousands-block number pooling in Massachusetts, i.e. donating thousands-blocks to the pool and receiving new numbering resources in thousands-blocks?
- DTE-GN-4 Please explain whether and how the use of virtual NXXs are compatible with thousands-block pooling in Massachusetts. Are blocks from a virtual NXX available for pooling and assignment to other carriers?
- DTE-GN-5 Refer to pp. 9-10 of the Testimony of William J. Rooney. To which issue in Global NAPs' Petition does the concern regarding alternative dispute resolution pertain? Explain how.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS TO VERIZON
D.T.E. 02-45

- DTE-VZ-1 (Issue 8). Refer to the Testimony of Karen Fleming and Verizon Redline General Terms and Conditions, § 21. Compare and contrast each insurance requirement and amount in Verizon's proposal with those required under Tariff No. 17. If differences exist, explain why Verizon's proposal is more appropriate than the requirements and amounts required under Tariff No. 17.
- DTE-VZ-2 (Issue 8). Does Verizon list each collocator in its central offices as an "additional insured" in Verizon's insurance program? Why or why not.
- DTE-VZ-3 (Issue 9). Refer to the Testimony of Jonathan B. Smith at p. 9. Does Verizon have the ability to audit all CLECs, CMRS providers, and IXC's that have access to Verizon's OSS? Explain why or why not.